

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GLOBAL REINSURANCE CORP.

Docket No. 07 CV 8350 (PKC)

NOTICE OF MOTION  
FOR PRO HAC VICE  
ADMISSION

Petitioner,

- against -

ARGONAUT INSURANCE COMPANY

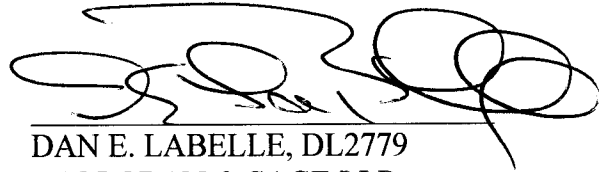
Respondent.

PLEASE TAKE NOTICE, that upon the attached Affidavits of Dan E. LaBelle, Esq. and Theresa W. Hajost, Esq., Respondent Argonaut Insurance Company will move this Court before the Honorable P. Kevin Castel, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the applicant, Theresa W. Hajost, Esq., who is a member in good standing of the bars of the States of Maryland and the District of Columbia, as evidenced by the Certificates of Good Standing annexed to said applicant's Affidavit, to be admitted pro hac vice to argue or try this case in whole and/or in part as counsel for Respondent. There are no pending disciplinary proceedings against the applicant in any State or Federal Court.

FILED  
U.S. DISTRICT COURT  
S.D.N.Y.  
2008 MAR 13 PM 2:04

9/0925-6044632  
MAR 13 2008

Dated: March , 2008  
Westport, Connecticut

A handwritten signature in black ink, appearing to read 'DAN E. LABELLE', is positioned above a horizontal line.

DAN E. LABELLE, DL2779  
HALLORAN & SAGE LLP  
Attorneys for Argonaut Insurance Company  
315 Post Road West  
Westport, CT 06880  
(203) 227-2855  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

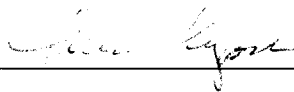
GLOBAL REINSURANCE CORP.	:	Docket No. 07 CV 8350 (PKC)
	:	
	:	
	:	DECLARATION OF
	:	THERESA W. HAJOST
	:	
Petitioner,	:	
	:	
- against -	:	
	:	
ARGONAUT INSURANCE COMPANY	:	
	:	
Respondent.	:	

I, Theresa W. Hajost, declare the following to be true under penalty of perjury and pursuant to 28 U.S.C § 1746:

1. I am a partner in the District of Columbia office of the law firm of Halloran & Sage, LLP, attorneys for Respondent, Argonaut Insurance Company ("Argonaut"), in this case.
2. I submit this Declaration in support of the motion for my admission *pro hac vice* to represent Argonaut in this matter.
3. I am an attorney admitted to the Bar of the State of Maryland since 1985 and the Bar of the District of Columbia since 1988. I am member in good standing of both bars. (A Certificate of Good Standing for the D.C. Bar is attached hereto as Exhibit A; a Certificate of Good Standing for the Maryland Bar is attached hereto as Exhibit B).
4. I have practiced law continuously since my admission in the State of Maryland in 1986. I have never been the subject of a disciplinary proceeding of any nature.
5. I have represented Argonaut in connection with the arbitration at issue in this matter since its inception. Argonaut has requested that I appear, with the Court's permission, as its attorney with Dan E. LaBelle, Esq. of Halloran & Sage, LLP who is a member of the bar of this Court.
6. Wherefore, I respectfully request that I be permitted to appear as counsel and advocate *pro hac vice* in this one case.

Executed on March 11, 2008.

:



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THERESA W. HAJOST  
HALLORAN & SAGE LLP  
1730 Pennsylvania Avenue, N.W.  
Suite 800  
Washington, DC 20006  
(202) 496-9270  
(202) 496-9279 (Fax)  
hajost@halloran-sage.com

## EXHIBIT A



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

THERESA W. HAJOST

---

was on the 3<sup>RD</sup> day of FEBRUARY, 1988

duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

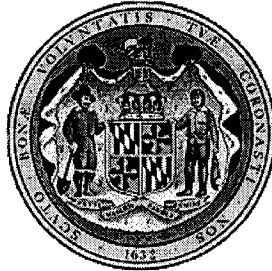
In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on March  
7, 2008.

GARLAND PINKSTON, JR., CLERK

By: *Garland Pinkston, Jr.*  
Deputy Clerk

## EXHIBIT B

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the seventeenth day of January, 1985,*

**Theresa Wirtz Hajost**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
tenth day of March, 2008.**

  
Clerk of the Court of Appeals of Maryland



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GLOBAL REINSURANCE CORP.	:	Docket No. 07 CV 8350 (PKC)
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	:	
	:	DECLARATION OF
	:	DAN E. LABELLE
	:	
Petitioner,	:	
	:	
- against -	:	
	:	
ARGONAUT INSURANCE COMPANY	:	
	:	
Respondent.	:	

I, Dan E. LaBelle, declare the following to be true under penalty of perjury and pursuant to 28 U.S.C § 1746:

1. I am a partner in the law firm of Halloran & Sage, LLP, attorneys for Respondent, Argonaut Insurance Company ("Argonaut") and attorney of record in this matter. I make this statement based on my personal knowledge of the facts set forth herein and in support of Argonaut's motion to admit Theresa W. Hajost as counsel *pro hac vice* to represent it in this matter.
2. I am a member in good standing of the Bar of the State of New York and was admitted to practice law in 1981. I am also admitted to the bars of the United States District Courts for the Southern and Eastern Districts of New York , and am in good standing with this Court.
3. I am also admitted to practice before the State of Connecticut, the District of Connecticut and the Circuit Court of Appeals.
4. I have known Theresa W. Hajost since 2001.
5. Theresa W. Hajost is a partner in Washington, D.C. office of Halloran & Sage, LLP.
6. I have found Ms. Hajost to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
7. Accordingly, I am pleased to move for the admission of Theresa W. Hajost, *pro hac vice*.
8. I respectfully submit a proposed order granting the admission of Theresa W. Hajost, *pro hac vice*.

WHEREFORE it is respectfully requested that the motion to admit Theresa W. Hajost, *pro hac vice*, to represent Argonaut in the above captioned matter, be granted.

Executed on March , 2008

A handwritten signature in black ink, appearing to read 'Dan E. Labelle', is written over a horizontal line.

DAN E. LABELLE, DL2779  
HALLORAN & SAGE LLP  
Attorneys for Argonaut Insurance Company  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GLOBAL REINSURANCE CORP.	:	Docket No. 07 CV 8350 (PKC)
	:	
	:	
	:	ORDER FOR ADMISSION
	:	PRO HAC VICE
	:	ON WRITTEN MOTION
Petitioner,	:	
	:	
- against -	:	
	:	
ARGONAUT INSURANCE COMPANY	:	
	:	
Respondent.	:	

Upon the motion of Dan E. LaBelle attorney for Argonaut Insurance Company and his  
Declaration in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Theresa W. Hajost  
Firm Name: Halloran & Sage LLP  
Address: 1730 Pennsylvania Avenue, N.W. Suite 800  
City/State/Zip: Washington, D.C. 20006  
Telephone/Fax: 202) 496-9270/(202) 496-9279  
Email Address: hajost@halloran-sage.com

is admitted to practice pro hac vice as counsel for Argonaut Insurance Company in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge

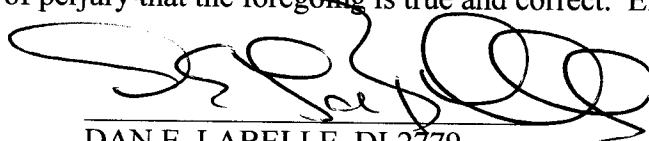
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GLOBAL REINSURANCE CORP.	:	Docket No. 07 CV 8350 (PKC)
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	:	CERTIFICATE OF
	:	SERVICE
	:	
Petitioner,	:	
	:	
- against -	:	
	:	
ARGONAUT INSURANCE COMPANY	:	
	:	
Respondent.	:	

I, DAN E. LABELLE, certify that a true and correct copy of the Notice of Motion for Admission *pro hac vice* of Theresa W. Hajost, the Declaration of Theresa W. Hajost, and the Declaration of Dan E. LaBelle, and the Proposed Order for Admission of Theresa W. Hajost Pro Hac Vice, was served on counsel for Petitioner Global Reinsurance Corp. of America by E-mail and FedEx on March , 2008 as follows:

Jeffrey S. Leonard, Esq.  
Virginia A. Pallotto, Esq.  
Joseph J. Schiavone, Esq.  
Budd Larner, P.C.  
150 John F. Kennedy Parkway  
Short Hills, NJ 07078  
jleonard@budd-larner.com  
jschiavone@budd-larner.com  
vpallotto@budd-larner.com

I declare under penalty of perjury that the foregoing is true and correct. Executed on March , 2008.



DAN E. LABELLE, DL2779  
HALLORAN & SAGE LLP  
Attorneys for Argonaut Insurance Company  
315 Post Road West  
Westport, CT 06880  
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